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10 Attorneys for Plaintiff
11 JANET S, DENMAN

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13 **UNITED STATES DISTRICT COURT**
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15 **DISTRICT OF NEVADA**

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17 JANET S, DENMAN,) Case No.: 2:16-cv-00104-GMN-PAL
18 Plaintiff,)
19 vs.) UNOPPOSED MOTION TO EXTEND
20) TIME TO FILE MOTION FOR
21) REMAND AND/OR REVERSAL
22 CAROLYN W. COLVIN, Acting)
23 Commissioner of Social Security,)
24 Defendant)
25 _____)

26
27 Plaintiff Janet S. Denman (“Plaintiff”) and defendant Carolyn Colvin,
28 Acting Commissioner of Social Security (“Defendant”), through their undersigned
29 counsel of record, hereby stipulate, subject to the approval of the Court, to extend
30 the time for Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to
31 August 26, 2016; and that Defendant shall have 30 days or until September 26,
32 2016, to file her opposition, if any is forthcoming. Any reply by plaintiff will be
33 due October 17, 2016.

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35 An extension of time for plaintiff is needed due to a serious illness. The
36 spouse of the associate in Counsel’s firm who this matter is assigned is dealing with
37

1 his Spouse's terminal illness which has unexpectedly worsened in the last few
2 weeks. Subsequent to a surgical procedure on July 6, 2016 to remove tumors in
3 the spine/hip as a result of stage 4 breast cancer, Counsel's spouse was not
4 discharged until July 9, 2016 and then Counsel's spouse was re-admitted to the
5 hospital for 5 days on July 15, 2016 due to complications arising from the July 6th
6 surgery. Counsel's spouse was also recently admitted on August 1, 2016 and then
7 discharged on August 5, 2016, to provide treatment for intractable pain related to
8 the terminal illness. Counsel sincerely apologizes to the court for any
9 inconvenience this may have had upon it or its staff.

10 Counsel for defendant has indicated, via e-mail, that this motion to extend
11 the time to file is not opposed.

12 | DATE: August 15, 2016, Respectfully submitted,

ROHLFING & KALAGIAN, LLP

/s/ *Marc V. Kalagian*

BY: _____
Marc V. Kalagian
Attorney for plaintiff JANET S, DENMAN

DATED: August 15, 2016

Daniel G. Bogden
United States Attorney

* /S/ April A. Alongi

IT IS SO ORDERED this
23rd day of August, 2016.

April A. Alongi
Special Assistant United States Attorney
Attorney for Defendant
[*Via email authorization]

Peggy A. Leen
U.S. Magistrate Judge